





CONSUMER ADVOCATE DIVISION STATE OF WEST VIRGINIA PUBLIC SERVICE COMMISSION

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January 22, 1998

Ms. Magalie Roman Salas Secretary Federal Communications Commission 1919 M Street, NW - Room 222 Washington, DC 20554

Re: Policy and Rules concerning the Interstate, Interexchange Marketplace; Implementation of Section 254 (g) of the Communications Act of 1934, as amended: CC docket No. 96-61.

Dear Ms. Salas:

On December 4, 1997, the Telecommunications Management Information Systems Coalition and the Utility Reform Network filed a Petition for Further Reconsideration of the Federal Communications Commission's ruling of August 20, 1997, in the above-captioned matter. In that ruling, the Federal Communications Commission ("Commission"), *sua sponte*, eliminated the public information disclosure requirement for "mass market services," as distinguished from "individually negotiated service arrangements," for domestic, interstate, interexchange carriers. The Consumer Advocate Division of the Public Service Commission of West Virginia ("WVCAD") writes in support of the Petition for Further Reconsideration.

In October 1996, the Commission adopted mandatory detariffing for mass market services, coupled with a requirement that long distance carriers provide pricing and service information to the public upon request. That requirement was predicated upon consumer need for information about rates, terms and conditions of long distance service in order to make intelligent choices in a competitive market. In August 1997, the Commission reversed position and eliminated the public disclosure requirement for mass market services, even though no party to the proceeding had requested that the public disclosure requirement be eliminated for widely available telecommunications services.

Implicit in the October 1996 Order is the Commission's recognition that the disclosure requirement promotes the public interest by making it easier for consumers to compare service offerings. Thousands of long distance calling plans and services are now available to the public. In order to make meaningful distinctions between competitive offerings, they must have access to detailed and accurate information regarding the plans. Moreover, by promoting consumer No. of Copies rec'd



awareness of all product and service options, the public disclosure requirement increases overall efficiency of the market, thereby maximizing consumer benefits from deregulation.

The public disclosure requirement also serves an important enforcement function. Because interstate long distance toll rates are geographically averaged and integrated under Section 254 (g) of the Communications Act, the public plays a critical role in bringing violations to the Commission's attention. Elimination of the information disclosure requirement undermines this important mechanism for ensuring that all carriers fully meet their obligations under the Communications Act.

The Commission's ruling of August 20, 1997, also appears to suggest that advertising and promotional materials will be available to serve the informational needs of customers. Based on our experience, advertising and promotional materials provided by carriers are rarely detailed enough to enable a customer to make direct service and carrier comparisons. Such materials are certainly not specific enough to alert consumers of carrier misconduct, which is obviously critical to initiating a complaint before the Commission. In short, without a specific Commission requirement, the information available publicly will fall far short of meeting consumers' need.

An example of the use of publicly available information to empower consumers is found in the annual study of intrastate toll rates in West Virginia published by the WVCAD since 1989. A copy of the 1997 study is attached. The purpose of the annual survey is to heighten overall consumer awareness that there are choices in the telecommunications market, and to facilitate actual competition in the intrastate toll market. We believe that effort has been successful, based upon substantial and steadily increasing consumer interest in the rate surveys, and the increased market strength of new entrants. While the WVCAD's access to intrastate rate information will not be directly affected by the Commission's ruling, the point is that our ability to gather, digest and disseminate information about services and products obviously depends on such information being publicly available. Without access to this information, the public will be made worse off.

The Consumer Advocate Division of the Public Service Commission of West Virginia fully supports the Petition for Further Reconsideration, and urges the Commission to promptly reinstate the public information disclosure requirement for widely available interstate services. Such information is critical to the evolution of a fully competitive, and efficient telecommunications market.

Very truly yours,

Billy Jack Gregg

Director

BJG/cs

CELECTION OF SURVEY AND COMPARISON OF INTRALATA LONG DISTANCE TELEPHONE RATES IN WEST VIRGINIA

AUGUST 1997

Consumer Advocate Division
of the Public Service Commission
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723 Kanawha Boulevard, East
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Charleston, West Virginia 25301

Billy Jack Gregg, Director

CONSUMER ADVOCATE DIVISION'S 1997 SURVEY AND COMPARISON OF INTRALATA LONG DISTANCE TELEPHONE RATES IN WEST VIRGINIA

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CONSUMER ADVOCATE DIVISION'S 1997 SURVEY AND COMPARISON OF INTRALATA LONG DISTANCE TELEPHONE RATES IN WEST VIRGINIA

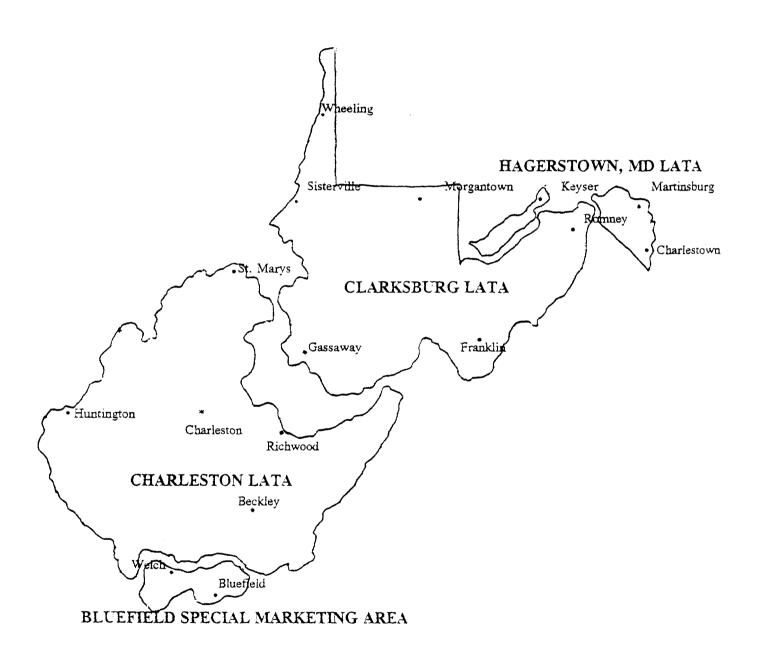
1997 has been a watershed year for competition in the long distance market in West Virginia. For the first time customers can choose their primary long distance carrier for intraLATA calls within West Virginia, just as they have been able to do on interLATA calls since 1985. The results of fully opening the West Virginia telephone toll market to competition have already been dramatic. As discussed below, this year's survey of long distance rates shows that costs to consumers have fallen by over 20%. However, as with other products, customers must be willing to shop and compare prices in order to get the best deal in long distance.

BACKGROUND

As a part of the breakup of the Bell System in 1984, the entire nation was divided into 164 zones, called Local Access and Transport Areas (LATAs). Under the scheme approved by Judge Harold Greene of the U.S. District Court for the District of Columbia, inter-exchange phone carriers (long distance carriers) could provide service between LATAs, but were forbidden from offering local service. Local exchange carriers (local phone companies) could provide local phone service, including long distance within LATAs, but were forbidden from offering long distance service between LATAs. The issue of whether long distance companies could also offer long distance service within each LATA was left to each state to decide for itself.

As shown on the map on the next page, West Virginia was divided into two principal LATAs, the Charleston LATA and the Clarksburg LATA. In addition, portions of the eastern panhandle were included in the Hagerstown, Maryland LATA, while the sections of Mercer and McDowell counties served by Citizens Telecom were placed in a special LATA called the "Bluefield Special Marketing Area" (SMA). Small portions of West Virginia bordering surrounding states were placed in other LATAs. Bell Atlantic-West Virginia (Bell-Atlantic) was the major local carrier in the Charleston and Clarksburg LATAs, and handled all long distance within those LATAs. Citizens' predecessor, GTE, was the dominant local carrier in the Bluefield SMA and handled all long distance within distance within the SMA.

LATAs* IN WEST VIRGINIA



^{*}Local Access and Transport Area

Since 1985, long distance carriers such as AT&T, MCI and Sprint have handled calls in West Virginia between LATAs and between the SMA and other LATAs. However, from 1985 to 1989 there was a moratorium on long distance competition within the LATAs. Under these arrangements competing long distance companies handled calls between cities in different LATAs, such as between Charleston and Wheeling, or between Beckley and Bluefield, while Bell Atlantic maintained a monopoly on calls inside the LATAs, such as from Charleston to Huntington or Wheeling to Morgantown.

INTRALATA COMPETITION

As a result of a wide-ranging agreement approved in 1988 by the Public Service Commission, Bell Atlantic's monopoly on intraLATA long distance ended on January 1, 1989. Since then, long distance companies have had the opportunity to offer service between all points in West Virginia. However, there was a catch. Bell Atlantic and Citizens retained "1 plus" presubscription rights within their respective LATAs, even after their monopolies on intraLATA calls ended. "Presubscription" is the designation of a particular phone company as your primary long distance carrier. For example, when you dial "1" plus the area code plus the number on an interLATA call, that call is automatically routed to your primary carrier.

Under the rules in effect in West Virginia from January 1, 1989 until August 15, 1997, Bell Atlantic was the presubscribed primary carrier for all long distance calls within the Charleston and Clarksburg LATAs. Citizens was the presubscribed primary carrier within the Bluefield SMA until April 1997. Under this prior arrangement, even if Sprint was your primary interLATA carrier, if you dialed "1-304" plus the phone number on an intraLATA long distance call, the call was automatically routed to Bell Atlantic (or Citizens). In order to route an intraLATA call to

Sprint (or any other carrier), it was first necessary to dial a five-digit access code. For example, if you wanted to call from Charleston to Lewisburg (intraLATA) and wanted Sprint to handle the call, you would dial 10-333-1-304-XXX-XXXX. The "10" tells the phone switch you want to use a secondary long distance carrier. The "333" is Sprint's ID code and tells the phone switch to bill your call through Sprint. If you dialed simply 1-304-XXX-XXXX, the call would be routed to Bell Atlantic.

In October 1995 the Public Service Commission ordered that Bell Atlantic and Citizens' presubscription privilege end by 1997. As a result, it is no longer necessary to dial access codes to use a carrier other than Bell Atlantic or Citizens. Customers in West Virginia can now choose their primary, or "1-plus", carrier for intraLATA long distance calls. The primary carrier can be the same carrier chosen by a customer for interLATA calls, or it can be an entirely different carrier. For example, you could choose AT&T as your primary carrier for interLATA calls, and Bell Atlantic as your primary carrier for intraLATA calls.

Presently, numerous companies besides Bell Atlantic and Citizens offer intraLATA long distance service in West Virginia. Ten of the largest are AT&T, MCI, Sprint, WorldCom, Budget Call, Excel, VarTec, Dial & Save, ProCom and Mountaineer Long Distance. AT&T, WorldCom, Sprint and MCI are known as "facilities-based carriers," since they carry some or all of the calls over their own facilities. Budget Call, Excel, VarTec, Dial & Save, ProCom and Mountaineer Long Distance are "resellers," meaning they buy services from facilities-based carriers at volume discounts, and then resell the service to the public.

In order to choose any of these companies as your primary intraLATA long distance company, customers will have to take action. Unless a customer requests that a particular company be designated as primary, the customer will continue to have Bell Atlantic or

Citizens as primary carrier by default. Even if a customer desires to retain Bell Atlantic or Citizens as primary intraLATA carrier, it is important to exercise choice. By affirmatively designating Bell Atlantic or Citizens as primary carrier, the customer will qualify for lower toll rates.

CURRENT RATES

The comparative rates of all the companies discussed above are shown on the following tables. The rates shown are applicable to customers who affirmatively designate those companies as primary carrier. Each table shows applicable rates for each company rounded to the nearest cent, and the cost of a ten minute phone call under the actual rate. Because the rates per minute shown are rounded, the cost of a 10 minute call calculated using the rounded rates may vary slightly from the actual cost shown.

Table 1 compares the costs of twelve long distance companies in the mileage band 23-55 miles. These rates would be applicable in the Charleston and Clarksburg LATAs and the Bluefield SMA. These rates would apply on calls between such cities as Charleston to/from Huntington, Elkins to/from Morgantown, and Princeton to/from Welch. The mileage band starting at 23 miles was chosen as the beginning point for this comparison because all calls within 22 miles of an exchange center are considered local calls and not subject to toll competition.

Table 2 shows long distance carrier rates in mileage band 56-124 miles. These rates would apply to calls between such cities as Charleston to/from Lewisburg and Wheeling to/from Elkins. The Bluefield SMA does not have a mileage band covering this distance because of it limited size. The two mileage bands shown on Tables 1 and 2 should cover most of the calls possible within each of the LATAs.

SHORT HAUL LONG DISTANCE RATES IN WEST VIRGINIA AUGUST 1997

Comparison of Rates and Costs in Mileage Band 23 - 55 miles CHARLESTON AND CLARKSBURG LATAS, BLUEFIELD SMA

DATES*

KAIES"		AT&T	BA-WV	BUDGET CALL	CITIZENS	DIAL & SAVE**	EXCEL**	MCI**	MTNEER	PROCOM	SPRINT	VARTEC**	WORLD COM
DAY	1st minute	0.15	0.15	0.31	0.30	0.20	0.13	0.15	0.31	0.15	0.20	0.27	0.15
	Each add'l.	0.15	0.15	0.27	0.30	0.20	0.13	0.15	0.27	0.15	0.20	0.27	0.15
EVENING	1st minute	0.15	0.15	0.19	0.15	0.20	0.13	0.15	0.21	0.15	0.20	0.27	0.15
	Each add'l.	0.15	0.15	0.18	0.15	0.20	0.13	0.15	0.19	0.15	0.20	0.27	0.15
NIGHT &	1st minute	0.15	0.15	0.13	0.15	0.20	0.13	0.15	0.14	0.15	0.20	0.27	0.15
WEEKEND	Each add'l.	0.15	0.15	0.12	0.15	0.20	0.13	0.15	0.13	0.15	0.20	0.27	0.15
COST OF A	10 MINUTE C	ALL* AT&T	BA-WV	BUDGET CALL	CITIZENS	DIAL & SAVE**	EXCEL**	MCI**	MTNEER	PROCOM	SPRINT	VARTEC**	WORLD COM
DAY (8am -	5pm)	1.50	1.50	2.75	3.00	2.00	1.30	1.50	2.75	1.50	2.00	2.70	1.50
EVENING (5	ipm - 11pm)	1.50	1.50	1.80	1.50	2.00	1.30	1.50	1.91	1.50	2.00	2.70	1.50
NIGHT (11pr	m - 8am)	1.50	1.50	1.20	1.50	2.00	1.30	1.50	1.27	1.50	2.00	2.70	1.50

^{*} Tariff rates for some companies are carried out to four decimal places. For ease of comparison, rates on this chart have been rounded to two decimal places for all companies. The cost of a 10 minute call is based on the actual rate for each company, and may not match calculations from the rates shown on the rate chart because of rounding.

^{**}Vartec, Excel and Dial & Save all charge 10 cents a minute for all calls within West Virginia, but also charge a monthly "access fee." Vartec charges \$5.00 a month, Dial & Save charges \$3.00 a month and Excel charges \$1.00 a month. MCI charges a \$5.00 a month "minimum bill" which applies only if usage does not amount to at least \$5.00 in any month. The rates shown prorate the monthly access charge across assumed average usage of 30 minutes per month.

SHORT HAUL LONG DISTANCE RATES IN WEST VIRGINIA AUGUST 1997

Comparison of Rates and Costs in Mileage Band 56 - 124 miles CHARLESTON AND CLARKSBURG LATAS

RATES*

KATES		АТ&Т	BA-WV	BUDGET CALL	CITIZENS	DIAL & SAVE**	EXCEL**	MCI**	MTNEER	PROCOM	SPRINT	VARTEC**	WORLD COM
DAY	1st minute	0.15	0.15	0.28	0.30	0.20	0.13	0.15	0.34	0.15	0.20	0.27	0.15
	Each add'l.	0.15	0.15	0.26	0.30	0.20	0.13	0.15	0.31	0.15	0.20	0.27	0.15
EVENING	1st minute	0.15	0.15	0.19	0.15	0.20	0.13	0.15	0.24	0.15	0.20	0.27	0.15
	Each add'l.	0.15	0.15	0.18	0.15	0.20	0.13	0.15	0.24	0.15	0.20	0.27	0.15
NIGHT &	1st minute	0.15	0.15	0.13	0.15	0.20	0.13	0.15	0.16	0.15	0.20	0.27	0.15
WEEKEND	Each add'l.	0.15	0.15	0.13	0.15	0.20	0.13	0.15	0.15	0.15	0.20	0.27	0.15
COST OF A	. 10 MINUTE C	ALL*											
		AT&T	BA-WV	BUDGET CALL	CITIZENS	DIAL & SAVE**	EXCEL**	MCI**	MTNEER	PROCOM	SPRINT	VARTEC**	WORLD COM
DAY (8am -	5pm)	1.50	1.50	2.61	3.00	2.00	1.30	1.50	3.17	1.50	2.00	2.70	1.50
EVENING (5pm - 11pm)	1.50	1.50	1.83	1.50	2.00	1.30	1.50	2.43	1.50	2.00	2.70	1.50
NIGHT (11p	m - 8am)	1.50	1.50	1.26	1.50	2.00	1.30	1.50	1.54	1.50	2.00	2.70	1.50

^{*} Tariff rates for some companies are carried out to four decimal places. For ease of comparison, rates on this chart have been rounded to two decimal places for all companies. The cost of a 10 minute call is based on the actual rate for each company, and may not match calculations from the rates shown on the rate chart because of rounding.

^{**}Vartec, Excel and Dial & Save all charge 10 cents a minute for all calls within West Virginia, but also charge a monthly "access fee." Vartec charges \$5.00 a month, Dial & Save charges \$3.00 a month and Excel charges \$1.00 a month. MCI charges a \$5.00 a month "minimum bill" which applies only if usage does not amount to at least \$5.00 in any month. The rates shown prorate the monthly access charge across assumed average usage of 30 minutes per month.

As can be seen from the preceding tables, there are presently a wide range of rates available to long distance customers in West Virginia. Customers seeking rate information from any of the companies listed in this survey should keep the following points in mind:

- Always ask for the lowest rate. When calling different telephone companies, ask directly for the lowest rate available for residential customers. Sales persons will not always voluntarily suggest the best plan.
- Flat rates vs. Time-of-day Rates. In the past year many companies have begun to offer a flat rate option for intraLATA calling. It should be noted that while such flat rates are very attractive and easy to understand, they may be more expensive for a customer who makes most of his intraLATA calls during nighttime hours. Customers must first understand their own calling habits in order to make the best deal.
- Ask about billing increments. Different companies bill in different increments. Generally, the smaller the billing increment, the better it is for the customer. For example, Bell Atlantic bills in 6 second increments. This means that if a call lasts 1 minute and 7 seconds, the customer will be billed for a call lasting 1 minute and 12 seconds. On the other extreme, VarTec bills in three minute increments. The same 1 minute and 7 second call on VarTec would result in a customer being billed for a 3 minute call.

IF YOU DON'T MAKE A CHOICE

If a customer doesn't make a choice, and doesn't affirmatively designate a carrier as primary intraLATA carrier, then the customer will continue to have Bell Atlantic or Citizens as primary carrier by default. More importantly, the customer will continue to be billed at the higher rates applicable to customers who do not make a choice. These higher rates are the same for both

companies and are as follows:

Day	1st Minute Each add'l	\$0.38 \$0.35
Evening	1st Minute Each add'l	\$0.23 \$0.21
Night	1st Minute Each add'l	\$0.15 \$0.14

Cost of a 10 Minute Call under Default Rates

Day (8am -5 pm)	\$3.53
Evening (5pm -11 pm)	\$2.12
Night (11 pm - 8 am)	\$1.41

As can be seen, a Bell Atlantic customer who does not designate a primary intraLATA carrier will continue to be charged \$3.53 for a 10 minute daytime call. On the other hand, if the same customer designates Bell Atlantic as primary carrier, the same call would cost only \$1.50. In other words, by exercising choice a customer can save over \$2.00 on a 10 minute intraLATA call.

CHANGES IN RATES SINCE 1996

The changes in rates since the CAD's last survey in July 1996 have been dramatic. As the August 1997 open competition date approached, Bell Atlantic, AT&T, MCI and others reduced their rates in order to effectively compete for business. Most companies also now offer flat rate calling plans for intraLATA calls. It should be noted that three resellers - VarTec, Dial & Save and Excel - offer "dime a minute" plans which can save money for some callers. However, consumers should be aware that all of these plans require monthly "access fees" as part of the 10¢ per minute rate. This means that if a customer's monthly usage is not very great, the "dime a

minute" plan can actually be more expensive than other alternatives. 1

Shown below is a comparison of the costs of a 10-minute daytime intraLATA call carried by different providers during 1996 and 1997, along with the changes in the costs of each provider. The companies are ranked from cheapest to most expensive based on current rates. It should be noted that the costs shown for VarTec, Dial & Save and Excel are based on the "dime a minute" rate and prorate the monthly "access fee" charged by each company over a presumed monthly intraLATA toll usage of thirty minutes.

Company	<u> 1996</u>	<u> 1997</u>	% Change
Excel	\$2.50	\$1.33	-46.8%
AT&T	\$2.86	\$1.50	-47.5%
Bell Atlantic	\$3.53	\$1.50	-57.5%
MCI	\$3.24	\$1.50	-53.7%
ProCom	\$1.50	\$1.50	0
WorldCom	\$1.50	\$1.50	0
Dial & Save	\$2.00	\$2.00	0
Sprint	\$3.24	\$2.00	-38.3%
VarTec	\$2.70	\$2.70	0
Budget Call	\$2.75	\$2.75	0
Mountaineer	\$2.75	\$2.75	0
Citizens	\$3.53	\$3.00	-15.0%
Average	\$2.67	\$2.05	-23.2%
Default Rate	\$3.53	\$3.53	0

As can be seen, the sum total of all of these changes is an overall decrease in average rates of 23.2%. Consumers should be aware that there may be other special offers or promotions by different companies which will produce different rates than those shown above. There are also more long distance providers in West Virginia than shown above. Consumers are encouraged to

¹VarTec charges a \$5 a month "access charge," Dial & Save charges \$3 a month, and Excel charges \$1 a month. In order for the "dime a minute" rate to be cheaper than the next lowest cost provider shown in this study, a customer would have to make over 100 minutes of intraLATA toll calls a month on VarTec, over 60 minutes a month on Dial & Save, and over 20 minutes a month on Excel. Average intraLATA toll use in West Virginia is 30 minutes a month.

call companies in which they are interested and request full information on all available rate plans.

Because each individual's calling patterns are unique, it is necessary to shop around in order to find the best plan.

ACCESS CODES AND PHONE NUMBERS

The names, phone numbers and access codes of some of the largest intraLATA carriers are shown below. The access codes for each company are given because, regardless of which company is your primary carrier, you may have as many secondary long distance carriers as you wish for both interLATA and intraLATA calls. You can place a long distance call over a secondary carrier by dialing five extra digits - "10" plus a three-digit ID code for the carrier - before you dial the normal "1" plus the area code plus the phone number. In the past year, some phone companies have begun being assigned four digit access codes. In order to use the four-digit code, you must first dial "101" plus the access code, before you dial the normal "1" plus the area code plus the phone number. All long distance companies will eventually be assigned four-digit access codes.²

Company	Phone Number	Access Code
AT&T	800-222-0300	10-288
Bell Atlantic	800-544-5662	101-6500
Budget Call	800-981-0368	10-368
Citizens	800-921-8101	10-096
Dial & Save	800-787-3333	10-457
Excel	800-251-6166	10-752
LD Wholesale Club	800-787-7887	10-297
MCI	800-333-5000	10-222
Mountaineer	800-554-3057	10-923

²The 10XXX codes and 101XXXX codes can also be used at pay phones to access a preferred carrier.

Network One	800-569-0080	10-213
ProCom	800-296-7030	N/A
Sprint	800-877-7746	10-333
VarTec	800-335-1515	10-811
WorldCom	800-375-1401	10-488*

*Use of this ID code for WorldCom will not necessarily produce the rates shown on the preceding charts. In order to obtain the most favorable rates, you must open an account with WorldCom.

The names and numbers of other long distance carriers can be found in the yellow pages of your phone book under "Telephone Companies." Although each of these companies will urge consumers to designate that company as the customer's primary long distance carrier, consumers must remember that they have the option of designating a company as either primary or secondary. However, it will be necessary to dial 10-XXX or 101-XXXX to access a carrier other than your primary carrier on a long distance call.

Attached as an appendix to this study are commonly asked questions concerning intraLATA long distance service in West Virginia.

For more information, contact Billy Jack Gregg or Carol Smith at 304/558-0526.

ADDENDUM: Please note that after publication of this report Citizens Telecommunications Company filed a new "Residential Simple Rate Service" plan which offers intraLATA service at a flat rate of 15¢ a minute. This new plan will be effective August 30, 1997

COMMONLY ASKED QUESTIONS ABOUT IN-STATE LONG DISTANCE

What is a LATA?

When a Federal judge broke up the Bell System in 1984, he divided the United States into 164 zones called Local Access and Transport Areas - LATAs. West Virginia was divided into two principal LATAs: the Charleston LATA and the Clarksburg LATA. Calling from the Charleston LATA to the Clarksburg LATA - for example, from Charleston to Morgantown - is just like making an interstate long distance call: the call will automatically go through your designated primary interstate long distance company. Until this year, Bell Atlantic and Citizens were the primary carriers on calls within LATA's - for example, from Charleston to Huntington, or Princeton to Welch. Beginning August 15, 1997, almost all West Virginians will be able to choose their own primary carrier for intraLATA long distance calls. Bell Atlantic is yet not allowed to connect calls between LATAs or states.

When can I choose a primary carrier for my intraLATA calls?

Citizens implemented dialing parity on April 1, 1997. Bell Atlantic will implement dialing parity on August 15, 1997. After that time, you will be able to choose your own primary intraLATA toll carrier, just as you do now for interLATA long distance. For example, this means that if you choose MCI for your primary carrier for both interLATA and intraLATA calls, when you dial "1-304" plus the number for an intraLATA call, the call will automatically be routed to MCI and you will be charged MCI rates. Hardy Telephone Company will not implement dialing parity until April 1998.

How do I choose a long distance company as my primary intraLATA carrier?

If you are interested in the rates of several companies, you should make phone calls to those companies and ask for information on the cheapest rate plans available for residential customers. Once you have decided on the company and rate plan that is best for you, call that company and tell them that you want them to be your primary carrier. Also tell them exactly which rate plan you are signing up for.

What happens if I don't choose a primary carrier for my intraLATA calls?

If you do not choose a primary carrier, you will continue to be billed the "default" rates of either Bell Atlantic or Citizens. This means you will continue to pay rates that are substantially higher than those available if you make a choice. For example, if you are a Bell Atlantic customer and fail to choose a primary carrier, you would be billed \$3.53 for a 10 minute daytime intraLATA call. On the other hand, if you choose Bell Atlantic as your primary carrier, the same call would cost only \$1.50, a savings of over 50%!

How much can I save by choosing a primary carrier for intraLATA calls?

Savings will vary from consumer to consumer depending on the number of calls and time of day that calls are made. As an example, the cost of a 10-minute daytime call between Charleston and Huntington or Morgantown and Elkins with twelve different companies in West Virginia is shown on the chart below. These companies are arranged in descending order with the lowest cost company on the top and the highest cost on the bottom:

Cost of a 10 minute daytime call in the 23 to 55 mile band

Excel	\$1.33
AT&T	\$1.50
Bell Atlantic	\$1.50
MCI	\$1.50
ProCom	\$1.50
WorldCom	\$1.50
Dial & Save	\$2.00
Sprint	\$2.00
VarTec	\$2.70
Budget Call	\$2.75
Mountaineer	\$2.75
Citizens	\$3.00
Default Rate	\$3.53

Can I still use a code to access a secondary long distance carrier? Will using a secondary carrier affect my status with my primary carrier?

You may use as many secondary long distance carriers as you wish by dialing the access code before each call. This is true for both intraLATA and interLATA long distance calls. Each long distance carrier has a unique access code. Some have five digit access codes and some have seven digit access codes. You can also use access codes at pay phones to reach a carrier you prefer.

How will I be billed?

Billing varies depending on which company used. Bills from Sprint, MCI, Budget Call, VarTec, Dial & Save and Mountaineer will be included in your local Bell Atlantic monthly bill. AT&T, WorldCom, and ProCom bill independently. If you intend to use WorldCom or ProCom

as secondary carriers, it is important to remember to open an account with them before using their access codes. This is not necessary with AT&T, Sprint, MCI, Mountaineer or Budget Call. Also, one does not have to open an account with WorldCom, Dial & Save or VarTec, if one uses their "casual" access code, but rates applicable to this casual code are higher than if a customer actually has an account with these companies.

Are there other long distance companies which provide intraLATA long distance service in West Virginia?

Yes. The companies mentioned in this article are not an all inclusive list. These are just the largest and/or companies which have advertised their services in West Virginia during the last year. Unfortunately for consumers, most, if not all, companies target business customers and therefore do not advertise their availability to residential customers. The phone numbers of long distance companies operating in your area are listed in the Yellow Pages of the phone book under "Telephone Companies."